

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Establishment of Rules and Policies)	IB Docket No. 95-91
for the Digital Audio Radio Satellite)	RM No 8610
Service in the 2310-2360 MHz)	DA No. 01-2570
Frequency Band)	

To: The Commission

COMMENTS OF THE NATIONAL ITFS ASSOCIATION

The National ITFS Association (“NIA”) submits these comments in response to the “Request for Further Comment on Selected Issues Regarding the Authorization of Satellite Digital Audio Radio Service Terrestrial Repeater Networks,” issued by the Chief, International Bureau (Public Notice Report No. SPB-176, November 1, 2001) (“Public Notice”). In the Public Notice, the Bureau seeks comment on provisions that would address the effect of Satellite Digital Audio Radio Service (“SDARS”) on MDS and ITFS licensees.

National ITFS Association

The National ITFS Association, established in 1978, is a non-profit, professional organization of ITFS licensees, applicants and others interested in the Instructional Television Fixed Service. The goals of NIA are to gather and exchange information about ITFS, to act as a conduit for those seeking information or assistance about ITFS, and to represent the interests of ITFS licensees and applicants. NIA and its members have participated in virtually every FCC

proceeding affecting ITFS. It has an interest in this proceeding, which considers matters potentially having interference effects on ITFS licensees.

Protections for ITFS Stations

The Public Notice sets out proposals for SDARS operators of terrestrial repeaters in the 2320 – 2345 MHz Band for protecting certain ITFS and MDS stations that might suffer interference and for providing notice to ITFS and MDS licensees of terrestrial DARS deployments. In making these proposals, the Bureau implicitly rejects watered-down protections suggested by the SDARS licensees and opts for protections similar to those applied to potential interference to ITFS and MDS stations from Wireless Communications Services licensees.

NIA supports the Bureau's proposals, and urges that they be adopted. NIA believes that SDARS licensees are reasonably held to the standards set forth and successfully implemented for WCS licensees, and that no lesser set of obligations is warranted.

Conclusion

For these reasons, the FCC should adopt the proposals set forth in the Public Notice with respect to SDARS obligations to cure interference to ITFS and MDS stations and to provide advance notice of deployments of terrestrial repeaters.

Respectfully submitted,

NATIONAL ITFS ASSOCIATION

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Comments of National ITFS Association was mailed this 14th day of December, 2001 to the following:

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